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*Attorneys for Plaintiff and
Counter-Defendant and
Third-Party Plaintiff GARY A. PULVER
dba PULVER CONSTRUCTION COMPANY*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GARY A. PULVER dba PULVER
CONSTRUCTION COMPANY, an individual,

Plaintiff,

vs.

BARRY KANE, an individual; ANNA KANE,
an individual; and 1059 LAKESHORE
BOULEVARD LLC, a Nevada limited liability
company fka 1059 Lakeshore Drive LLC,

Defendants.

1059 LAKESHORE BOULEVARD LLC, a
Nevada limited liability company,

Counterclaimant,

vs.

GARY A. PULVER dba PULVER
CONSTRUCTION COMPANY, an individual,
and ROES 1-50, inclusive,

Counter-Defendants.

Case No.: 3:20-cv-00673-MMD-CSB
Honorable Miranda M. Du

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
OPPOSITION TO RENO TAHOE
GEO ASSOCIATES, INC.'S MOTION
FOR SUMMARY JUDGMENT AS TO
PULVER CONSTRUCTION
COMPANY'S SECOND CAUSE OF
ACTION FOR BREACH OF
CONTRACT**

(First Request)

GARY A. PULVER dba PULVER
CONSTRUCTION COMPANY, an individual,

Third-Party Plaintiff,

vs.

CRUZ CONSTRUCTION COMPANY, INC., a
Nevada corporation; CLASS A ROOFING, LLC,
a Nevada limited liability company; A & E
ARCHITECTS, a Montana professional corporation;
RENO TAHOE GEO ASSOCIATES, INC., a
Nevada corporation; ERIC'S CONCRETE
PAVERS, INC., a Nevada corporation;
JULIAN MACDONALD dba JP MCDONALD
MILLWORKS; and DOES 1 through 20,

Third-Party Defendants.

Plaintiff/third-party defendant GARY A. PULVER dba PULVER CONSTRUCTION
COMPANY, and third-party plaintiff RENO TAHOE GEO ASSOCIATES, INC., by and
through their undersigned counsel, hereby stipulate that defendant/third-party plaintiff GARY A.
PULVER dba PULVER CONSTRUCTION COMPANY, may have an extension of five (5)
business days from February 3, 2023, to February 10, 2023, to file his opposition to *Reno Tahoe
Geo Associates, Inc.'s Motion for Summary Judgment as to Pulver Construction Company's
Second Cause of Action for Breach of Contract* (ECF No. 83).

This is defendant/third-party plaintiff's first request for an extension to file his opposition.
This request is not interposed for delay or any other improper purpose.

DATED this 19th day of January 2023.

DATED this 19th day of January 2023.

Lemons, Grundy & Eisenberg

Viloria, Oliphant, Oster & Aman L.L.P.

By: /s/ Dane A. Littlefield, Esq.

By: /s/ Nathan J. Aman, Esq.

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1 and

2 **Hoy Chrissinger Kimmel Vallas**

3
4
5 By: /s/ Theodore E. Chrissinger, Esq.

6 Theodore E. Chrissinger, Esq.

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12 *Attorneys for Plaintiff and*

13 *Counter-Defendant and Third-Party*

14 *Plaintiff GARY A. PULVER dba*

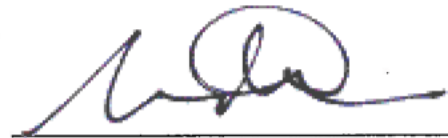
15 PULVER CONSTRUCTION

16 COMPANY

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18 **ORDER**

19 IT IS SO ORDERED.

20 DATED this 19th day of January 2023.

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HONORABLE MIRANDA M. DU
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

Pursuant to F.R.C.P. 5(b), I certify that I am an employee of LEMONS, GRUNDY & EISENBERG, and that on January 19, 2023, I served a true and correct copy of the ***STIPULATION AND ORDER TO EXTEND TIME TO FILE OPPOSITION TO RENO TAHOE GEO ASSOCIATES, INC.'S MOTION FOR SUMMARY JUDGMENT AS TO PULVER CONSTRUCTION COMPANY'S SECOND CAUSE OF ACTION FOR BREACH OF CONTRACT (First Request)*** on the party(s) set forth below by:

_____ **BY MAIL:** in an envelope with postage thereon fully prepaid to be placed in the U.S. Mail at Reno, Nevada, following ordinary business practices;

_____ **BY E-MAIL:** by transmitting by electronic mail to the respective e-mail addresses;

_____ **BY PERSONAL SERVICE:** in an envelope to be hand delivered this date;

_____ **BY OVERNIGHT DELIVERY:** in an envelope to be delivered to an overnight delivery carrier with delivery fees provided for;

_____ **BY FACSIMILE:** by transmitting by facsimile to the respective fax telephone phone number(s);

 X **BY USING THE COURT'S EFS** which electronically served the following;

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Alan R. Wechsler, Esq. Decker J. Cady, Esq. 940 Southwood Blvd., Suite 102 Incline Village, NV 89451 Telephone: (775) 548-5020 <i>alan@mountainsidelaw.com</i> <i>decker@mountainsidelaw.com</i>	<i>Attorney for Defendant and Counter-claimant 1059 Lakeshore Boulevard LLC and Defendants Barry Kane and Anna Kane</i>
John A. Aberasturi, Esq. Brent L. Ryman, Esq. Erickson, Thorpe & Swainston, LTD P.O. Box 3559 99 Arroyo Street Reno, NV 89505 Telephone: (775) 786-3930	<i>Attorneys for Third-Party Defendant Cruz Construction Company, Inc.</i>

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4 5 6 7 8	Karen M. Baytosh, Esq. Andrew M. Bunn, Esq. Bremer Whyte Brown & O'Meara, LLP 50 W. Liberty Street, Suite 1090 Reno, NV 89501 Telephone: (775) 440-2389 <i>kbaytosh@bremerwhyte.com</i> <i>abunn@bremerwhyte.com</i>	<i>Attorneys for Third-Party Defendant,</i> JULIAN MACDONALD dba JP MCDONALD MILLWORKS
9 10 11 12	Nathan J. Aman, Esq. Viloria, Oliphant, Oster & Aman, LLP P.O. Box 62 Reno, NV 89504 Telephone: (775) 284-8888 <i>naman@renonvlaw.com</i>	<i>Attorneys for Third-Party Defendant,</i> RENO TAHOE GEO ASSOCIATES, INC.
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17 18 19 20	Bryce B. Buckwalter, Esq. Keating Law Group 9130 West Russell Road, Ste. 200 Las Vegas, Nevada 89148 Telephone: (702) 228-6800 <i>bbuckwalter@keatinglg.com</i>	<i>Attorneys for Third-Party Defendant,</i> Eric's Concrete Paver, Inc.
21 22 23 24 25	Charlie H. Luh, Esq. Craig D. Slater, Esq. LUH & Associates 8987 W. Flamingo Rd., Ste. 100 Las Vegas, NV 89147 Telephone: (702) 367-8899 <i>cluh@luhlaw.com</i> <i>cslater@luhlaw.com</i>	<i>Attorneys for Third-Party Defendant,</i> Class A Roofing, Inc.

/s/ Susan G. Davis
Susan G. Davis